

Pryor & Mandelup, L.L.P.
Attorneys for Robert L. Pryor, Trustee
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Hearing Date: December 16, 2021 at 10:00 a.m.
Objection Date: December 9, 2021 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7

NEDRA K. AMBROSE a/k/a
NEDRA K. BELLE,

Case No.: 8-19-71407-las

Debtor.

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the application (the “Application”) of Robert L. Pryor, Chapter 7 Trustee (the “Trustee”) of the Bankruptcy Estate of Nedra K. Ambrose a/k/a Nedra K. Belle (the “Debtor”), the debtor in the above-captioned Chapter 7 case, by his attorneys, Pryor & Mandelup, L.L.P., dated November 19, 2021, a hearing will be held on December 16, 2021 at 10:00a.m. (the “Hearing Date”), or as soon thereafter as counsel can be heard, before Honorable Louis A. Scarcella, United States Bankruptcy Judge, at the Courthouse located at the U.S. Bankruptcy Court, 290 Federal Plaza, Courtroom 970, Central Islip, New York 11722, for entry of an Order pursuant to 11 U.S.C. §§ 105, and 363(b), (f), and (h), Rules 2002 and 6004 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), and E.D.N.Y. LBR 6004-1 (i), authorizing and approving the sale (the “Sale”) of the real property known as 497 East 94th Street, Brooklyn, New York 11212, Block 4691, Lot 53 (the “Real Property”) pursuant to a Residential Contract of Sale, made as of November 10, 2021 (the “Contract of Sale”), between the Trustee, as seller, and 497 East 94th Street LLC (“Purchaser”), as purchaser, free and clear of all liens, claims,

and encumbrances (collectively “Liens”), with such Liens, if any, to attach to the net proceeds of the Sale to the same extent, priority, and validity as existed as of the Debtor’s filing of her Chapter 13 Petition in this case on February 25, 2019, “as is”, “where is”, “with all faults,” with no representations or warranties of any kind or nature whatsoever, except as to uninsurable title, (ii) making findings regarding the propriety of the Sale, (iii) granting relief related to the Sale, including protection for the Purchaser under 11 U.S.C. § 363(m), (iv) waiving the 14 day stay of Bankruptcy Rule 6004(h), and (v) granting the Trustee such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to E.D.N.Y. LBR 9006-1(a), any objection or response (the “Objections”) to the Application must be made in writing, must state the standing of the objectant, state with particularity the grounds for the objection, shall conform to the Federal Rules of Bankruptcy Procedure and Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically in accordance with General Order 559. (General Order 559 and the User’s Manual for the Electronic Case Filing System can be found at www.nyeb.uscourts.gov, the official Website of the Bankruptcy Court), by registered users of the Bankruptcy Court’s case filing system, and by all other parties in interest on 3.5 inch diskette, CD or DVD preferably in Portable Document Format (PDF), Microsoft Word or any other Windows based word processing format (with a hard copy delivered directly to the Chambers of the Honorable Alan S. Trust at the above address), and must be served in accordance with General Order 559 upon: (i) Pryor & Mandelup, L.L.P., Counsel to the Trustee, 675 Old Country Road, Westbury, NY 11590, Attention: Mark E. Cohen, Esq., and (ii) the Office of the United States Trustee, 560 Federal Plaza, Central Islip, NY 11722, so as to be filed and actually received no later than December 9, 2021 at 4:00p.m. on that day (the “Objection Date”).

PLEASE TAKE FURTHER NOTICE, that if no objections are received by the

Objection Date, the relief requested in the Application may be granted without a hearing.

Dated: Westbury, New York
November 19, 2021

PRYOR & MANDELUP, L.L.P.
Attorneys for Chapter 7 Trustee

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